

Reed Zars  
Wyo. Bar No. 6-3224  
Attorney at Law  
910 Kearney Street  
Laramie, WY 82070  
Phone: (307) 760-6268  
Email: reed@zarslaw.com

KAMALA D. HARRIS  
Attorney General of California  
DAVID A. ZONANA (*pro hac vice pending*)  
CA Bar No. 196029  
Supervising Deputy Attorney General  
MARY S. THARIN (*pro hac vice pending*)  
CA Bar No. 293335  
GEORGE TORGUN (*pro hac vice pending*)  
CA Bar No. 222085  
Deputy Attorneys General  
1515 Clay Street, 20th Floor  
P.O. Box 70550  
Oakland, CA 94612-0550  
Telephone: (510) 879-1974  
Facsimile: (510) 622-2270  
E-mail: Mary.Tharin@doj.ca.gov

[*additional counsel listed on signature page*]

*Attorneys for Applicants for Intervention*

**UNITES STATES DISTRICT COURT  
DISTRICT OF WYOMING**

STATE OF WYOMING, et al.,

Petitioners,

v.

UNITED STATES DEPARTMENT OF THE  
INTERIOR, et al.,

Respondents

Case No. 16-cv-00285-SWS [Lead]

[Consolidated With 2:16-cv-00280-SWS]

Assigned: Hon. Scott W. Skavdahl

**INTERVENOR-APPLICANTS  
CALIFORNIA AND NEW MEXICO'S  
MOTION TO INTERVENE AS  
RESPONDENTS**

Pursuant to Federal Rule of Civil Procedure 24 and Local Rule 83.6(e) of this Court, the  
State of California and State of New Mexico, (collectively, "Supporting State Intervenors")

respectfully move to intervene in the above-captioned matter as respondent-intervenors as of right or, in the alternative, permissively. Intervention is necessary because Petitioners seek relief that would harm the State Intervenors' sovereign interests of recovering royalties for their natural resources, protecting their citizens' health and welfare, and fighting the harmful impacts of global climate change.

Counsel for the State Intervenors have conferred with counsel for Respondents, U.S. Department of the Interior et al., who take no position on the Motion. The States of Montana, Wyoming and North Dakota do not oppose the Motion, and Citizen Group Intervenors consent to the Motion. Petitioners Western Energy Alliance ("WEA") and Independent Petroleum Association of America ("IPAA") oppose the Motion.

Petitioners seek to invalidate the Bureau of Land Management's recently promulgated Waste Prevention, Production Subject to Royalties, and Resource Conservation Rule. State Intervenors seek intervention to preserve the fiscal, health and environmental benefits that the Rule provides to their citizens. The Motion is based on the Memorandum in Support of State of California and State of New Mexico's Motion to Intervene as Respondents, and the Declarations in Support of States Intervenors' Motion to Intervene submitted herewith. In addition, State Intervenors are conditionally filing Intervenor Applicants [Proposed] Opposition to the State Petitioners' Motions for Preliminary Injunction.

Dated: December 15, 2016

Respectfully Submitted,

/s/ Reed Zars

Reed Zars

Wyo. Bar No. 6-3224

Attorney at Law

910 Kearney Street

Laramie, WY 82070

Phone: (307) 760-6268

Email: reed@zarslaw.com

*Attorneys for Applicants for Intervention*

KAMALA D. HARRIS

Attorney General of California

DAVID A. ZONANA (*pro hac vice pending*)

CA Bar No. 196029

Supervising Deputy Attorney General

MARY S. THARIN (*pro hac vice pending*)

CA Bar No. 293335

GEORGE TORGUN (*pro hac vice pending*)

CA Bar No. 222085

Deputy Attorneys General

1515 Clay Street, 20th Floor

P.O. Box 70550

Oakland, CA 94612-0550

Telephone: (510) 879-1974

Facsimile: (510) 622-2270

E-mail: Mary.Tharin@doj.ca.g

*Attorneys for the State of California, by and  
through the California Air Resources Board*

HECTOR BALDERAS

Attorney General of New Mexico

William Grantham (*pro hac vice pending*)

NM Bar No. 15585

Assistant Attorney General

Post Office Drawer 1508

Santa Fe, New Mexico 87504-1508

Telephone: (505) 827-6000

Direct: (505) 717-3520

Facsimile: (505) 827-5826

Email: wgrantham@nmag.gov

*Attorneys for the State of New Mexico*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 15th day of December, 2016, I electronically filed the foregoing Respondent State Intervenors' Motion to Intervene, attached memorandum, affidavits, and proposed Order with the Clerk of the Court using the CM/ECF system, which caused all counsel of record to be served electronically.

/s/ Reed Zars

Reed Zars

Attorney for Applicants for Intervention